

# WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue  
New York, NY 10019-6099  
Tel: 212 728 8000  
Fax: 212 728 8111

December 30, 2024

## VIA ECF

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-cv-6563 (LJL); No. 24-cv-353 (LJL)

Dear Judge Liman:

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this letter in furtherance of their submissions at 24-cv-6563, ECF No. 170, and No. 24-cv-353, ECF No. 200, regarding the evidence on which they intend to rely and wish the Court to consider at the January 3, 2025 hearing regarding Plaintiffs' motion to hold Mr. Giuliani in contempt and enter sanctions for failure to comply with discovery orders, 24-cv-6563, ECF Nos. 105–106, and the Court's order for Mr. Giuliani to show cause why he should not be held in contempt for failing to comply with the turnover orders, No. 24-cv-353, ECF No. 175.

In addition to the materials already indicated, *see* 24-cv-6563, ECF No. 170 and No. 24-cv-353, ECF No. 200, Plaintiffs also may rely on and ask the Court to consider all of the material on both dockets filed since those filings, as well as the deposition transcripts of Mr. Rudolph Giuliani and Monsignor Alan Placa, who were deposed last week.<sup>1</sup>

Plaintiffs do not understand the Court's orders, 24-cv-6563, ECF No. 112, and No. 24-cv-353, ECF No. 177, to require the disclosure of evidence Plaintiffs intend to use on rebuttal or for cross-examination or impeachment should Mr. Giuliani in fact testify. Plaintiffs will of course bring any such materials to the January 3 hearing for disclosure to the Court and to Mr. Giuliani at that time. If Plaintiffs have misunderstood the orders or should the Court prefer that Plaintiffs provide advance disclosure of these materials, Plaintiffs are prepared to proceed as the Court directs. Should such advance disclosure be necessary, Plaintiffs ask that the Court permit Plaintiffs to either email the materials to the Court or seek to file certain of them under seal or with redactions, as certain of the materials contain potentially sensitive personal information of Mr. Giuliani.

---

<sup>1</sup> Plaintiffs may also seek to add the deposition transcripts of the three witnesses who are scheduled to be deposed tomorrow at 9 a.m., if those depositions occur: Maria Ryan, Theodore Goodman, and Ryan Medrano.

December 30, 2024

Page 2

Plaintiffs attempted to meet and confer about these items with opposing counsel today. Plaintiffs also proposed to Defendant that the parties agree to stipulate to the admissibility of the disclosed materials in order to streamline any evidentiary issues for purposes of the January 3 hearing only, while reserving the right to object to the admissibility of those same materials at trial. Defendant's counsel has not responded.

Respectfully submitted,

s/ Aaron E. Nathan